



CDSS

WILL LIGHTBOURNE
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STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



EDMUND G. BROWN JR.
GOVERNOR

June 18, 2015

Kathryn Harwell, Director
Stanislaus County Community Services Agency
P.O. Box 42
Modesto, CA 95353-0042

Dear Ms. Harwell:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office during the course of the Civil Rights Compliance Review of **July 21 - 25, 2014**. Enclosed is the final report on the review. We apologize for the delay.

There are some compliance issues (deficiencies) identified in the report, which will require the development of a Corrective Action Plan (CAP). Please submit your CAP within 60 days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the enclosed report.

Please submit your CAP in both hardcopy and, in an effort to comply with ADA website accessibility, we also require the CAP to be submitted electronically as a Word document via email at crb@dss.ca.gov.

We will provide a copy of your report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well. In addition, these documents are published on our website at <http://www.cdss.ca.gov/civilrights/PG2890.htm>.

If you need technical assistance in the development of your CAP, please feel free to contact **Cindy Guzman** at (916) **654-2117**. You may also contact her by e-mail at cindy.guzman@dss.ca.gov.

Sincerely,

Original signed by Lisa Bandaccari for

JIM TASHIMA, Chief
Civil Rights Bureau
Human Rights and Community Services Division

Enclosure

c: **William Ryan, Civil Rights Coordinator**

Ryan Fruchtenicht, Chief
CalFresh Policy Bureau

Carlos Ocampo, Chief
Field Operations Bureau

Taadhimeda Haynes
Staff Services Manager I

Sysvanh Kabkeo, Chief
CalFresh Management Operations Section

Paul Gardes
CalFresh Policy Bureau

Jacqueline Hom
Refugee Programs Bureau

Joe Torres, Office of Civil Rights
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
Western Region

Andrew Riesenber
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
Western Region

Kevin Aslanian
Coalition of California Welfare Rights Organizations, Inc.

Antoinette Dozier
Western Center on Law and Poverty

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
Stanislaus County Community Services Agency**

**Conducted
July 21 –24, 2014**

**California Department of Social Services
Human Rights and Community Services Division
Civil Rights Bureau
744 P Street, M.S. 8-16-70
Sacramento, CA 95814
(916) 654-2107**

Reviewer

Cindy Guzman

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I. CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Stanislaus County Community Services Agency with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on July 21 – 24, 2014. An exit interview was held to review the preliminary findings.

The review was conducted in the following locations: Name of Facility	Address	Programs Reviewed	Non-English languages spoken by a substantial number of clients (5% or more)
Community Service Agency – Main Office	251 East Hacket Rd. Modesto, CA	Call Center Adult Programs, (IHSS & APS) Non-Assistance Food Stamps, StanWORKs, Welfare-to-Work, Children’s Services, (Family Maintenance & Family Reunification.	Spanish
Financial Services Division	251 East Hacket Rd. Modesto, CA	Vendor Contracts	Spanish
Community Service Agency	252 East Hacket Rd. Modesto, CA	State Hearing Office/Room	Spanish
The West Modesto Community Center	401 E. Paradise Road, Bldg. #4	StanWORKs CalWORKs	Spanish

	Modesto, CA		
The East County Service Center	1405 West F. Street Oakdale, CA	CalWORKs CalFresh Welfare-to-Work	Spanish

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2014 Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the county.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections
- Discussions with community advocate groups. In this review the following organization(s) were contacted for feedback:

California Rural Legal Assistance
1111 I Street, Suite 310
Modesto, CA 95354-2347
(530) 742-5191

Haven Women's Center
619 13th Street
Modesto, CA 95354-2455

Disability Resource Agency for Independent Living
920 12th Street
Modesto, CA 95354-2320

(CRB did not get a response back from the Advocates listed above)

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities

- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	3	2
Children Social Workers	3	3
Adult Program Workers	4	3
Receptionist/Screeners	3	2
Total	13	10

Program Manager Surveys

Number of surveys distributed	1
Number of surveys received	6

Reviewed Case Files

English speakers' case files reviewed	29
Non-English or limited-English speakers' case files reviewed	71
Languages of clients' cases	English, Spanish, ASL, Assyrian, Cantonese, Arabic, Punjabi, Farsi.

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX summarizes findings from discussions with community organizations, including advocate groups.

Section X reviews the county's compliance plan, and provides either approval of the plan as submitted, or lays out additional information to be submitted to gain approval.

Section XI of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Some - times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			Office Hours are generally from 8 A.M. – 5 P.M., Monday – Friday, Welfare-to-Work have made appointments on Saturdays recently for customers to sign new contracts; There is 24 Hour Emergency Response. Applicants may apply over the phone, internet, home visits if needed.
Does the county have extended hours to accommodate clients?			X	Office Hours are generally from 8 A.M. – 5 P.M., Monday – Friday, Welfare-to-Work made appointments on Saturdays recently for customers to sign new contracts; There is 24 Hour Emergency Response. Applicants may apply over the phone, internet, home visits if needed.
Can applicants access services when they cannot go to the office?	X			Applicants may apply over the phone, internet, home visits if needed.

Does the county ensure the awareness of available services for individuals in remote areas?	X			Outstations are throughout the county, street fairs, health fairs, and the county fair, local events informational table, county website, call center. The county also gives information by speaking at local high school classes, and on various radio stations to let people know about services.
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Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13 – 6/11)?	X			
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			
Is the current version of Pub 13 available in Arabic, Armenian Cambodian, Chinese, English, Farsi Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian Spanish, Tagalog, Ukrainian, Vietnamese?	X			
If the PUB 13 is not displayed in all the languages available, is there a poster that indicates that the Pub 13 is available in all 18 languages?	X			
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?	X			
Were the current versions of the required posters present in the lobbies?	X			

Signage, posters, pamphlets	Yes	No	Some- times	Comments
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	X			

B. Corrective Actions

None

C. Recommendation

The county is required to use the latest version of each of the referenced documents. For your information, the most recent version for each of the above referenced documents is:

Pub 13	"Your Rights under California Welfare Programs"	06/11
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact the Civil Rights Bureau to receive the most recent versions, or download the Pub 13 from the CRB website <http://www.cdss.ca.gov/civilrights/entres/forms/English/pub13.pdf>.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

A. Findings and Corrective Actions

1. Facility Location: The East County Service Center, 1405 West F. Street, Oakdale, CA

Facility Element	Findings	Corrective Action
Parking	Parking did not have a Van-accessible space.	For every 6 (Accessible), or fraction of 6 parking spaces at least 1 shall be a van parking space. (CA T24 11B-208.2.4) (ADA 208.2.4) pg. 176 Signs identifying van parking

		<p>36” high. (CA T24 11B-502.6.4.1) pg 169</p> <p style="text-align: center;"><u>OR</u></p> <p>...in white or a suitable contrasting color (CA T24 11B-502.6.4.2) pg 169</p> <p>The centerline of the International Symbol of Accessibility shall be a max. of 6” from the centerline of the parking space, its sides parallel to the length of the parking space and its lower corner at, or lower side aligned with, the end of the parking space length. (CA T24 11B-502.6.4.1) pg 169</p>
Exterior entrance	<p>No International Sign of Accessibility (ISA) at building’s Main Entrance.</p> <p>Entrance door pressure too heavy at 6 lbs. (Right), 12 lbs. (Left).</p>	<p>In existing buildings and facilities where not all entrances comply with Section 33, Doors, Doorways and Gates, entrances complying with Section 33, Doors, Doorways and Gates shall be identified by the International Symbol of Accessibility complying with “International Symbol of Accessibility” heading in Section 57, Signs & Identification. (CA T24 11B-216.6) (ADA 216.6) pg 28</p> <p>The force for pushing or pulling open a door or gate other than fire doors shall be as follows:</p> <ol style="list-style-type: none"> 1. Interior hinged doors and gates: 5 lbs. max. 2. Sliding or folding doors: 5 lbs. max. 3. Required fire doors: the minimum opening force allowable by the appropriate administrative

		authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. (CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 & 2)) pg 224
Men's Restroom	Door symbol (sign) is missing.	Men's toilet and bathing facilities shall be identified by an equilateral triangle, 1/4" thick with edges 12" long and a vertex pointing upward. (CA T24 11B-703.7.2.6.1) pg 310 The triangle symbol shall contrast with the door, either light on a dark background or dark on a light background. (CA T24 11B-703.7.2.6.1) pg 310 The symbol shall be mounted at 58" min. and 60" max. above the finish floor or ground surface measured from the centerline of the symbol. (CA T24 11B-703.7.2.6) pg 310 Where a door is provided the symbol shall be mounted within 1" of the vertical centerline of the door. (CA T24 11B-703.7.2.6) pg 310
Women's Restroom	Door pressure too high at 22 lbs.	The force required to activate operable parts shall be 5 lbs. (CA T24 11B-309.4) (ADA 309.4) pg 224

2. Facility Location: The West Modesto Community Center, 401 E. Paradise Road, Bldg. #4, Modesto, CA

Facility Element	Findings	Corrective Action
Lobby	Pub 13 not available in audio and large print at	Pamphlets supplied by CDSS entitled "Your Rights Under

	reception.	California Welfare Programs” shall be made available in all CWD waiting rooms and reception areas and shall be distributed and explained to each applicant/recipient at intake and reinvestigation of eligibility. The pamphlets shall be in the primary languages of the CWD’s applicant/recipient population including alternate formats (e.g., cassette tapes, large print, etc.). (Div 21-107.221)
Men’s Restroom	Soap dispenser is too high at 44”.	All operable parts, including coin slots, shall be 40” max. above the finish floor. (CA T24 11B-603.5) pg 319
Women’s Restroom	Soap dispenser is too high at 44”.	All operable parts, including coin slots, shall be 40” max. above the finish floor. (CA T24 11B-603.5) pg 319

3. Facility Location: State Hearing Office/Room, 252 E. Hacket Road, Modest, CA

Facility Element	Findings	Corrective Action
Hearing Room	No Findings	None

4. Facility Location: Call Center, 251 East Hacket Road, Modesto, CA

Analyst reviewed Call Center for Interpretive Services availability, and auxiliary aids for clients needing accommodations. There were no findings at the Call Center.

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals

with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	X			Language needs are self-identified by the client when filling out the application. Also, reception staff has the I SPEAK cards available to help identify the client's language needs.
Does the county use a primary language form?	X			
Does the client self-declare on this form?	X			
Are non-English- or limited- English-speaking clients provided bilingual services?	X			

Question	Yes	No	Some-times	Comments
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	X			Non-English speaking clients are assigned to bilingual workers. The county also has a list of bilingual workers they can call.
Is there a delay in providing services?		X		
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			A list of county certified interpreters is available through the human resources department. If there is no one available, then they use the language line.
Are county interpreters determined to be competent?	X			They are certified.
Does the county have adequate interpreter services?	X			The county uses a list of county certified interpreters that is available through the Human Resources Department.
Does the county allow minors to be interpreters? If so, under what circumstances?		X		
Does the county allow the client to provide his or her own interpreter?	X			
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			
Does the county use the CDSS-translated forms in	X			Case review shows the correct forms are sent out in the

Question	Yes	No	Some-times	Comments
the clients' primary languages?				appropriate language.
Is the information that is to be inserted into NOA translated into the client's primary language?	X			Case review shows the correct forms are sent out in the appropriate language.
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?			X	Yes, the county provides auxiliary aids and services needed, however the Paradise office needs to ensure the Pub 13 in Braille and audio are available in the reception area for clients.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			
Does the county offer screening for learning disabilities?	X			
Is there an established process for offering screening?	X			

B. Corrective Actions

Area of Findings	Corrective Actions
Auxiliary Aids	Stanislaus County Community Services Agency shall ensure the availability of auxiliary aids and services to persons who are deaf or hearing impaired, or persons with impaired speech, vision or manual skills where necessary

Area of Findings	Corrective Actions
	to afford such persons an equal opportunity to access program services. Div 21-115.41

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	Children's Services	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh
Ethnic origin documentation	CWS-CMS, CAT form, documents in hard case files.	Record of Contacts.	SAWS-1, C-IV	SAWS-1, C-IV
Primary language documentation	CWS-CMS, CAT form, documents in hard case files.	Confidential Report. (Report of Abuse).	SAWS-1, C-IV	SAWS-1,C-IV
Method of providing bilingual services and documentation	CWS-CMS	Records of Contacts.	C-IV Narrative	C-IV Narrative
Client provided own interpreter	CWS-CMS Journal.	Records of Contacts.	C-IV Narrative	C-IV Narrative
Method to inform client of potential problem using own interpreter	None Found	None Found	C-IV Narrative	C-IV Narrative
Release of information to Interpreter	None Found	None Found	None Found	None Found
Individual's	None Found	N/A	C-IV Narrative	C-IV Narrative

Documented Item	Children's Services	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh
acceptance or refusal of written material offered in primary language				
Documentation of minor used as interpreter	Minors not used as interpreters, None Found.	N/A	Minors are not used as interpreters, None Found.	Minors are not used as interpreters, None Found.
Documentation of circumstances for using minor interpreter temporarily	None Found.	N/A	None Found.	None Found.
Translated notice of actions (NOA) contain translated inserts	Letters are sent out in appropriate language.	N/A	Spanish inserts in NOA's were translated.	Spanish inserts in NOA's were translated.
Method of identifying client's disability	CWS-CMS Journal.	Records of Contacts	C-IV Narrative	C-IV Narrative
Method of documenting a client's request for auxiliary aids and services	CWS-CMS Journal.	Records of Contacts.	C-IV Narrative	C-IV Narrative

A. Corrective Actions

B.

None. Good Documentation in case files reviewed.

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well

as the continuing training programs.

A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?	X			
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			
Does the county provide employees Cultural Awareness Training?	X			
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?	X			
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			

B. Corrective Actions

None.

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Sometimes	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	X			
Did the employees know who the Civil Rights Coordinator is?	X			
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X			
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

B. Corrective Action None.

IX. COMMUNITY INPUT

The CRB contacted:

California Rural Legal Assistance
1111 I Street, Suite 310
Modesto, CA 95354-2347
(530) 742-5191

Haven Women's Center
619 13th Street
Modesto, CA 95354-2455
(209) 577-5980

Disability Resource Agency for Independent Living
920 12th Street

Modesto, CA 95354-2320
(209) 521-7260

There was no response from the Advocates listed above.)

X. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Stanislaus County Department of Social Services Civil Rights Compliance Plan for the 2014 is approved as submitted.

XI. CONCLUSION

The CDSS reviewer found the Stanislaus County Community Services Agency staff warm, welcoming, informative and very supportive. Particular thanks to William Ryan, Civil Rights Coordinator, for organizing the details of the review. In each District Office, staff was helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the Stanislaus County Community Services Agency in satisfactory compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. County staff continues to reflect a commitment similar to that expressed by management with respect to ensuring access, assistance, and compliance.

The Stanislaus County Community Services Agency must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.